Filed: 8/12/2020 10:53 AM
Lynne Finley
District Clerk
Collin County, Texas
By Tatiana Ortega Deputy
Envelope ID: 45309962

NO. 417-53803-2020

IN THE INTEREST OF	§	**IN THE DISTRICT COURT**
	§	
S.A.L., J.L.L., AND L.A.L.	§	**417TH JUDICIAL DISTRICT**
	§	
CHILDREN	§	**COLLIN COUNTY, TEXAS**

Amended

RESPONSE TO RESPONDENT'S MOTION FOR SANCTIONS

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Michael Long, Petitioner herein, and files this response to Movant's Motion for Sanctions filed by Kelly Long, pursuant to Rule 13 of the Texas Rules of Civil Procedure and respectfully shows the Honorable Court the following:

I.

Movant filed the Motion for Sanctions alleging that Petitioner violated Rule 13 of the Texas Rules of Civil Procedure.

II.

Specifically, Movant contends that Petitioner violated Rule 13 in the following manner:

1. According to Movant, the Ex Parte Temporary Restraining Order is groundless and brought in bad faith and for the purpose of harassment "as there was no emergency to be dealt with, but rather Michael Long wanted to keep his children for longer than his extended summer possession as ordered and as such filed pleadings to create an emergency where one did not exist.

2. According to Movant, Petitioner's attorney and Petitioner engaged in misleading conduct by:

   a. "intentionally failed to address the alleged emergencies and abuse in

order to present an Ex Parte TRO without notice to Respondent's counsel,"

b. Leading the Court to believe "that this was not an active case, and that Respondent/Mother was not represented by counsel,"

c. "deliberately contact[ing] the Court [E]x [P]arte knowing that Respondent/ Mother was represented by counsel and fail[ing] to contact Respondent's counsel,"

d. failing "to inform the Court that Respondent was actively represented by Counsel when the application for the Ex Parte TRO was heard,

III.

1. *The pleading does not violate Rule 13 of the Texas Rules of Procedure:*

The Ex Parte Temporary Restraining Order is not groundless nor is it brought in bad faith or for the purpose of harassment. The Ex Parte Temporary Restraining Order was submitted with a Petition to Modify the Parent-Child Relationship with a request for Temporary Restraining Order including extraordinary relief. The Ex Parte Temporary Restraining Order is the only document alleged to have been filed that is groundless or filed in bad faith with the purpose to harass. The filing of the Proposed Order, and the subsequent filing of the signed order were not groundless or meant to harass. In almost every case in Collin County, a proposed order is electronically filed. This is never groundless or harassing. It is in fact a requirement. The filing of the signed order was done after the court served the signed order and asked that we file it. This was not groundless

or in bad faith.

2. *The actions of Petitioner and his attorney were not misleading.*

   a. Petitioner and Respondent had a case in Comal County. The divorce was granted on July 24, 2015. A Modification was filed March 28, 2016. The modification was mediated, and a settlement reached on August 4, 2017. A copy of the Comal County Register of Actions for Cause No. C2015-0238D is attached as Exhibit 1 and incorporated herein for all purposes. It should be noted that in Comal County on July 30, 2020 when the document was printed, Respondent was represented by Carter Casteel and Amber Shemesh in that matter.

   b. As part of the mediated agreement in the modification, the parties agreed to transfer the case to Collin County. The Motion to Transfer was filed in Comal County on June 2, 2020. The order was signed on July 9, 2020 in Comal County. There was no active pleading. The final order was signed July 9, 2020. *See* Exhibit 1.

   c. The case transferred in to Collin County on July 13, 2020. The Collin County Register of Actions for Cause 417-53803-2020 is attached as Exhibit 2 and is incorporated herein for all purposes. It should be noted that on July 30, 2020 when the document was printed, Respondent was represented by Casteel Carter. Further, the pleadings transferred in were only orders. The first active pleading in the Collin County cause was the Petition to Modify filed by Petitioner.

   d. Petitioner hired Ms. Nielsen on July 27, 2020. Petitioner provided a copy of the Order signed on July 7, 2020 in Comal County, Texas to his attorney and indicated that the case had been transferred to Collin County, Texas but he was not aware of any active pleadings. See Email attached as Exhibit 3 attached and incorporated

fully herein, offered specific to this communication only and without any intent to waive attorney-client privilege.

e. Petitioner's prior attorney drafted sent the affidavit in support of the Petition to Modify and the request for the TRO with extraordinary relief at approximately 4:30 p.m. and Petitioner's current attorney filed the Petition to Modify Parent Child Relationship and the Proposed Temporary Restraining Order and Order Setting Hearing at 5:12 p.m. on July 27, 2020. The filing submission for the Petition to Modify Parent Child Relationship is attached as Exhibit 4 and is incorporated herein for all purposes. The filing submission for the Proposed Temporary Restraining Order and Order Setting Hearing is attached as Exhibit 5 and is incorporated herein for all purposes.

f. The Petition to Modify requested personal service to Respondent.

g. Petitioner's attorney was contacted via email asking about the safety of the children and why the exchange was missed at 7:43p.m. July 27, 2020. Petitioner's attorney responded that the children were safe. Email communication attached as Exhibit 6 and incorporated for all purposes.

h. The filings were both rejected at 8:33 a.m. on July 28, 2020. The filing return for the Petition to Modify Parent Child Relationship is attached as Exhibit 7 and is incorporated herein for all purposes. The filing return for the Proposed Temporary Restraining Order and Order Setting Hearing is attached as Exhibit 8 and is incorporated herein for all purposes.

i. Petitioner's attorney's office opened at 8:30 a.m. on July 28, 2020. Celia Morgan, the paralegal assigned to the case resubmitted the case to the e-file system.

j. Petitioner's attorney received notice of a filing of a An Application for Writ of

Habeus Corpus filed by Respondent's attorney on July 28, 2020. Petitioner's attorney instructed the paralegal to copy Respondent on any filings, and that was done and is being done.

As set out above, Petitioner's pleading and the actions of Petitioner and his attorney are not violative Rule 13 of the Texas Rules of Civil Procedure and therefore, the Court should not impose any sanction available under Rule 215.

WHEREFORE, PREMISES CONSIDERED, Petitioner, Michael Long, prays that the Motion for Sanctions filed by Kelly Long, Defendant, be in all respects, **DENIED** and the Plaintiff be granted such other and further relief, special or general, legal or equitable, as may be shown that Plaintiff is justly entitled to receive.

Respectfully submitted,

Bailey & Galyen

By:

Elizabeth Nielsen
Texas Bar No. 24034601
Email: enielsen@galyen.com
2216 S. Cooper St.
Arlington, Texas 76013
Tel. (817) 635-7013
Fax. (817) 276-6013
Attorney for Petitioner.
Michael Long

VERIFICATION

STATE OF TEXAS §
§
COUNTY OF Tarrant §

BEFORE ME, the undersigned authority, personally appeared Elizabeth Nielsen, who, on oath, stated that the statements made in the foregoing Response to Respondent's Motion for Sanctions Pursuant are true and correct.

Elizabeth Nielsen

SUBSCRIBED AND SWORN TO BEFORE ME on this the 11th day of August, 2020, to certify which witness my hand and seal of office.

Notary Public, State of Texas

LUSIA RODRIGUEZ
Notary Public, State of Texas
Comm. Expires 01-26-2023
Notary ID 130090970

CERTIFICATE OF SERVICE

I certify that on August 11, 2020 a true and correct copy of Plaintiff's Response to Motion for Sanctions Pursuant to Rule 13 of the Texas Rules of Civil Procedure was served on Amber Shemesh electronically through the electronic filing manager.

Elizabeth Nielsen

REGISTER OF ACTIONS
CASE NO. C2015-0238D

In the Matter of the Marriage of Michael Long and Kelly Long §§§§§

Case Type: **Divorce - Children**
Date Filed: **02/11/2015**
Location: **433rd District Court**

PARTY INFORMATION

Petitioner **Long, Michael**

181 HIGH POINT RIDGE
SEGUIN, TX 78155

Attorneys
TRACIE WRIGHT - RENEAU
Retained
830-625-6933(W)

~~MARILEE H. BROWN~~
~~*Retained*~~
~~830-629-6955(W)~~

Respondent **Long, Kelly**

1914 Blue Goose
New Braunfels, TX 78130

CARTER CASTEEL
Retained
830-608-1611(W)

AMBER SHEMESH
Retained
214-432-2501(W)

~~Pro SeSTEPHEN ALAN BARRERA~~
~~*Retained*~~
~~210-532-5546(W)~~

~~TRACIE WRIGHT - RENEAU~~
~~*Retained*~~
~~830-625-6933(W)~~

EVENTS & ORDERS OF THE COURT

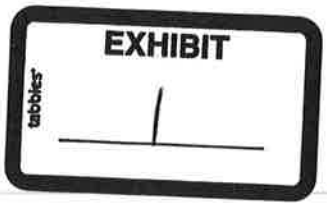
DISPOSITIONS

07/24/2015 **Final Decree** (Judicial Officer: Stephens, Charles A., II)

07/09/2020 **Judgment After Original Judgment** (Judicial Officer: Stephens, Charles A., II)

OTHER EVENTS AND HEARINGS

02/11/2015 **ORIGINAL PETITION (OCA)**
02/17/2015 **NOTICE OF HEARING**
02/17/2015 **SERVICE**
02/17/2015 **Citation**
Long, Kelly — Unserved
02/17/2015 **SERVICE**
02/17/2015 **Citation**
Long, Kelly — Served 02/18/2015; Response Due 03/16/2015; Returned 02/25/2015
02/24/2015 **COUNTERCLAIM**
02/24/2015 **ANSWER**
02/25/2015 **NOTICE**
02/25/2015 **NOTICE**
02/27/2015 **NOTICE**
03/03/2015 *CANCELED* **Temporary Orders** (9:00 AM) (Judicial Officer Steel, Gary)
Passed
04/20/2015 **Motion**
05/06/2015 **NOTICE OF HEARING**
05/08/2015 **Motion to Withdraw** (9:00 AM) (Judicial Officer Stephens, Charles A., II)
Result: Granted
05/08/2015 **ORDER TO WITHDRAW** (Judicial Officer: Stephens, Charles A., II)
05/26/2015 **INTERVENTION**
06/03/2015 **Motion**
06/05/2015 **NOTICE OF HEARING**
07/24/2015 *CANCELED* **Divorce-Contested** (9:00 AM) (Judicial Officer Stephens, Charles A., II)



Re-Set
07/24/2015 **Divorce-Contested** (9:00 AM) (Judicial Officer Stephens, Charles A., II)
Result: Granted
07/24/2015 **RULE AGREEMENT**
07/24/2015 **ORDER TO PAY ATTORNEY FEES** (Judicial Officer: Stephens, Charles A., II)
07/24/2015 **FINAL DECREE OF DIVORCE** (Judicial Officer: Stephens, Charles A., II)
07/24/2015 **DOCKET SHEET/JUDGE'S NOTES**
07/24/2015 **DOCUMENT**
07/24/2015 **CERTIFICATE**
03/28/2016 **MOTION TO MODIFY (OCA)**
03/28/2016 **REQUEST**
03/31/2016 **SERVICE**
03/31/2016 **Citation**

Long, Kelly	Served	04/01/2016
	Response Due	06/20/2016
	Returned	06/15/2016

04/06/2016 **ANSWER**
04/06/2016 **COUNTERCLAIM**
04/12/2016 **Motion**
04/15/2016 **NOTICE OF HEARING**
04/29/2016 **NOTICE**
05/05/2016 **AMENDED PETITION**
05/06/2016 **Temporary Orders** (9:00 AM) (Judicial Officer Stephens, Charles A., II)
Result: Granted
06/09/2016 **Motion**
06/13/2016 **NOTICE OF HEARING**
06/15/2016 **Motion**
06/24/2016 **Motion to Enter Order** (9:00 AM) (Judicial Officer Stephens, Charles A., II)
Result: Granted
06/24/2016 **TEMPORARY ORDERS**
04/17/2017 **APPEARANCE OF COUNSEL**
04/17/2017 **MOTION TO MODIFY**
04/17/2017 **Motion**
04/17/2017 **Motion**
04/17/2017 **Motion**
04/18/2017 **RESPONSES TO MOTION**
04/18/2017 **MOTION TO MODIFY**
04/19/2017 **Temporary Orders** (9:00 AM) (Judicial Officer Stephens, Charles A., II)
04/19/2017 **SUBPOENA ISSUED**
04/20/2017 **MOTION FOR MEDIATION**
04/20/2017 **MOTION TO SET**
04/25/2017 **MOTION TO SUBSTITUTE ATTORNEY**
04/25/2017 **NOTICE OF HEARING**
04/25/2017 **NOTICE OF HEARING**
04/25/2017 **ORDER**
05/08/2017 **PROPOSED ORDER**
05/08/2017 **ORDER FOR SUBSTITUTED SERVICE** (Judicial Officer: Steel, Gary)
05/16/2017 **RULE 11**
05/23/2017 **ORDER**
05/25/2017 *CANCELED* **Motion for Mediation** (1:30 PM) (Judicial Officer Stephens, Charles A., II)
Passed
05/25/2017 **NOTICE OF HEARING**
08/04/2017 **AGREEMENT**
08/07/2017 **LETTER**
08/11/2017 *CANCELED* **Trial on the Merits** (9:00 AM) (Judicial Officer Stephens, Charles A., II)
Passed
02/13/2018 **MOTION TO ENTER JUDGMENT**
02/15/2018 **NOTICE OF HEARING**
02/27/2018 **Motion to Enter Order** (9:00 AM) (Judicial Officer Stephens, Charles A., II)
Result: Passed Hearing
06/01/2020 **NOTICE OF APPEARANCE**
06/02/2020 **MOTION TO TRANSFER**
06/03/2020 **APPLICATION**
06/03/2020 **PROPOSED ORDER**
06/09/2020 **PROPOSED ORDER**
06/12/2020 **NOTICE OF HEARING**
06/12/2020 **MOTION TO WITHDRAW**
06/18/2020 **MOTION TO SUBSTITUTE ATTORNEY**
06/23/2020 **NOTICE OF HEARING**
06/26/2020 **Motion to Enter Order** (9:00 AM) (Judicial Officer Stephens, Charles A., II)
Result: Passed Hearing
07/09/2020 **ORDER**
07/09/2020 **ORDER TO TRANSFER**
07/10/2020 **NOTICE SENT OF COURT ORDER**
07/13/2020 **CERTIFICATE**
07/13/2020 **LETTER OF TRANSFER**

Financial Information

Petitioner Long, Michael
Total Financial Assessment 333.75

	Total Payments and Credits			333.75
	Balance Due as of 07/30/2020			**0.00**
02/12/2015	Transaction Assessment			302.75
02/12/2015	EFile Electronic Payment - Texfile	Receipt # 2015-132595	Long, Michael	(302.75)
03/29/2016	Transaction Assessment			30.50
03/29/2016	EFile Electronic Payment - Texfile	Receipt # 2016-143735	Long, Michael	(30.50)
04/27/2017	Transaction Assessment			0.50
04/27/2017	EFile Electronic Payment - Texfile	Receipt # 2017-153742	Long, Michael	(0.50)

	Respondent Long, Kelly			
	Total Financial Assessment			130.00
	Total Payments and Credits			130.00
	Balance Due as of 07/30/2020			**0.00**
02/25/2015	Transaction Assessment			60.00
02/25/2015	EFile Electronic Payment - Texfile	Receipt # 2015-132946	Long, Kelly	(60.00)
04/06/2016	Transaction Assessment			70.00
04/06/2016	EFile Electronic Payment - Texfile	Receipt # 2016-143978	Long, Kelly	(70.00)

REGISTER OF ACTIONS
CASE NO. 417-53803-2020

In the Interest of S.L., J.L. and L.L. Children

§
§
§
§
§

Case Type: **Family Transfer In from Another County**
Date Filed: **07/13/2020**
Location: **417th District Court**

PARTY INFORMATION

Petitioner	**Long, Michael**	**Lead Attorneys** **Meredith Chacon** *Retained* 210-560-2260(W)
Respondent	**Long, Kelly**	**Carter Casteel** *Retained* 830-608-1611(W)

EVENTS & ORDERS OF THE COURT

OTHER EVENTS AND HEARINGS

07/13/2020	**Transfer In From Other County (OCA) $90.00** *Transfer Letter*
07/13/2020	**Certificate** *Electronic Certification*
07/13/2020	**Agreed Order** *Agreed Order for Motion to Transfer Venue - July 9, 2020*
07/13/2020	**Order** *Final Decree of Divorce - July 24, 2015*
07/13/2020	**Order** *Order in Suit Affecting the Parent-Child Relationship - July 9, 2020*
07/13/2020	**Letter** *Notice Letter - Michael Long*
07/14/2020	**Mailed** *Notice of Family Case Transferred In*
07/28/2020	**Motion** *Petition to Modify Parent Child Relationship*
07/28/2020	**Motion - Family - $65.00** *Petition for Writ of Habeas Corpus*
07/29/2020	**Temporary Restraining Order** *Temporary Restraining Order and Order Setting Hearing for Temporary Orders*
08/12/2020	**Temporary Restraining Order Hearing** (9:00 AM) (Judicial Officer Wheless, Cynthia M) *THIS CASE MUST BE HEARD*

FINANCIAL INFORMATION

Petitioner Long, Michael

	Total Financial Assessment			65.00
	Total Payments and Credits			65.00
	Balance Due as of 07/30/2020			**0.00**
07/28/2020	Transaction Assessment			65.00
07/28/2020	Payment	Receipt # DC-15856-2020	Long, Michael	(65.00)

Respondent Long, Kelly

	Total Financial Assessment			155.00
	Total Payments and Credits			155.00
	Balance Due as of 07/30/2020			**0.00**
07/14/2020	Transaction Assessment			90.00
07/21/2020	Payment	Receipt # DC-15220-2020	Shemesh, Amber K	(90.00)
07/28/2020	Transaction Assessment			65.00
07/28/2020	Payment	Receipt # DC-15842-2020	Long, Kelly	(65.00)

Elizabeth Nielsen

From: Michael Long <rightrocks444@gmail.com>
Sent: Monday, July 27, 2020 11:40 AM
To: Elizabeth Nielsen
Cc: Mary Stephens
Subject: Most recent orders
Attachments: Order in SAPCR.pdf

Beth,

I believe that this is the most recent filing, although Meredith mentioned that the case is now in Collin County, so I don't know what additional things were filed there.

Looking Forward,
Michael Long

Celia Morgan

From: No-Reply@eFileTexas.gov
Sent: Monday, July 27, 2020 5:13 PM
To: Celia Morgan
Subject: Filing Submitted for Case: 417-53803-2020; In the Interest of S.L., J.L. and L.L. Children; Envelope Number: 44866590

EFILE TEXAS.gov

Filing Submitted

Envelope Number: 44866590
Case Number: 417-53803-2020
Case Style: In the Interest of S.L., J.L. and L.L. Children

The filing below has been submitted to the clerk's office for review. Please allow 24 - 48 hours for clerk office processing.

Filing Details	
Court	Collin County - District Clerk
Date/Time Submitted	7/27/2020 5:12 PM CST
Filing Type	Motion to Modify
Filing Description	Petition to Modify Parent Child Relationship
Type of Filing	EFileAndServe
Filed By	Celia Morgan
Filing Attorney	Elizabeth Nielsen

Fee Details

Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.

If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).

This envelope is pending review and fees may change.

Case Fee Information	$5.54
Payment Service Fees	$2.29
Provider Service Fees	$3.00
Provider Tax Fees	$0.25
Motion to Modify	$68.00
Court Fees	$60.00

EXHIBIT 4

• Optional Services	Fee Per Quantity		
• Issue Citation	$8.00	1	$8.00
Proposed Order			$8.00
• Optional Services	Fee Per Quantity		
• Issue Temporary Restraining Order	$8.00	1	$8.00

Total:$81.54 (The envelope still has pending filings and the fees are subject to change)

Document Details	
Lead Document	Petition to Modify with Affidavit and SO.pdf
Lead Document Page Count	16
File Copy	Download Document
This link is active for 30 days.	

For technical assistance, contact your service provider

ProDoc eFiling

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Available 24x7 and online with chat

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Celia Morgan

From: No-Reply@eFileTexas.gov
Sent: Monday, July 27, 2020 5:13 PM
To: Celia Morgan
Subject: Filing Submitted for Case: 417-53803-2020; In the Interest of S.L., J.L. and L.L. Children; Envelope Number: 44866590

EFILE TEXAS.gov

Filing Submitted

Envelope Number: 44866590
Case Number: 417-53803-2020
Case Style: In the Interest of S.L., J.L. and L.L. Children

The filing below has been submitted to the clerk's office for review. Please allow 24 - 48 hours for clerk office processing.

Filing Details	
Court	Collin County - District Clerk
Date/Time Submitted	7/27/2020 5:12 PM CST
Filing Type	Proposed Order
Filing Description	Temporary Restraining Order and Order Setting Hearing
Type of Filing	EFileAndServe
Filed By	Celia Morgan
Filing Attorney	Elizabeth Nielsen

Fee Details

Your account is never charged until your filing is accepted. If you see any pending charges on your account prior to acceptance, this is an authorization hold to ensure the funds are available so your filing can be accepted without delay.

If the filing is canceled or rejected these funds will be released and will return to your account according to your financial institution's policies (typically 3-10 business days).

This envelope is pending review and fees may change.

Case Fee Information	$5.54
Payment Service Fees	$2.29
Provider Service Fees	$3.00
Provider Tax Fees	$0.25
Motion to Modify	$68.00
Court Fees	$60.00

EXHIBIT
tabbies 5

• Optional Services	Fee Per Quantity		
• Issue Citation	$8.00	1	$8.00
Proposed Order			$8.00
• Optional Services	Fee Per Quantity		
• Issue Temporary Restraining Order	$8.00	1	$8.00

Total:$81.54 (The envelope still has pending filings and the fees are subject to change)

Document Details	
Lead Document	TRO and Order Setting Hearing.pdf
Lead Document Page Count	4
File Copy	Download Document
This link is active for 30 days.	

For technical assistance, contact your service provider

ProDoc eFiling

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Phone: (800) 759-5418
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Please do not reply to this email. It was automatically generated.

Elizabeth Nielsen

From: Elizabeth Nielsen
Sent: Monday, July 27, 2020 7:52 PM
To: Alexandra Willen; mchacon@ccatxlaw.com
Cc: Amber Shemesh; Adriana Cancino
Subject: Re: Long: Today's Exchange

Thank you for reaching out before assuming the worst. It is my understanding that the children are safe. I don't typically respond to email after business hours, but I wanted to save you and your client any unnecessary concern.

Please call my office tomorrow and I will be happy to discuss this case.

I look forward to working with you.

Enjoy your evening.

Best regards,

Elizabeth

Regards,

Elizabeth Nielsen
Bailey & Galyen
Family Law Attorney
Board Certified in Family Law
2216 S. Cooper Street
Arlington, Texas 76013

Toll Free (800) 529-8008
Main (817) 635-7013
Fax (817) 276-6013

enielsen@galyen.com

Please see our Web Sites for a listing
of all offices and locations
http://www.thetexasattorney.com
http://www.pinjury.com

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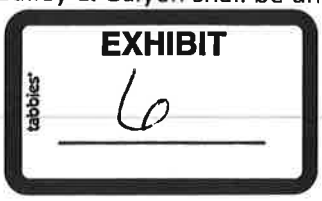

From: Alexandra Willen <awillen@shemeshfamilylaw.com>
Sent: Monday, July 27, 2020 7:43 PM
To: mchacon@ccatxlaw.com; Elizabeth Nielsen
Cc: Amber Shemesh; Adriana Cancino
Subject: Re: Long: Today's Exchange

Ms. Chacon, Ms. Nielsen,

Ms. Long is increasingly concerned about the welfare of the children. Michael did not show up to exchange, and he has not responded to any text messages from Ms. Long. He did not answer Ms. Long's mothers facetime yesterday, nor did he answered Ms. Long's scheduled facetime call today. I understand that this is unusual.

Ms. Long will be contacting Seguin police department, or Guadalupe County Sherriff's office to perform a welfare check at the residence, unless someone can confirm that he and the children are home and not in any danger. Please get back to me as soon as possible, so that appropriate steps can be taken this evening if need be.

Thank you,

Lexa Willen

Alexandra "Lexa" Willen
Associate Attorney

awillen@shemeshfamilylaw.com
Law Offices of Amber Shemesh, P.C.
12222 Merit Dr., Suite 1200
Dallas, TX 75251
214-432-2501 main
214-432-2510 facsimile

==========
==========
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==========
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From: "mchacon@ccatxlaw.com" <mchacon@ccatxlaw.com>
Reply-To: "mchacon@ccatxlaw.com" <mchacon@ccatxlaw.com>
Date: Monday, July 27, 2020 at 4:54 PM
To: Alexandra Willen <awillen@shemeshfamilylaw.com>
Cc: Elizabeth Nielsen <enielsen@galyen.com>
Subject: Re: Long: Today's Exchange

Ms. Willen-
My client has retained Elizabeth Nielsen to represent him. I am copying her on this email. I have signed and sent her the motion and order of substitution and I believe she will be circulating it and filing it with the court.

Meredith Chacon,
Chacon, Campbell & Alexander, PLLC

110 Broadway, Suite 380

San Antonio, TX 78205

210-560-2260

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Sender Meredith Chacon, Chacon, Campbell & Alexander, PLLC, San Antonio, TX.

On Monday, July 27, 2020, 03:39:25 PM CDT, Alexandra Willen <awillen@shemeshfamilylaw.com> wrote:

Ms. Chacon,

I have emailed and called your office in an attempt to speak regarding today's exchange. Ms. Long is headed to Waco to get the children as ordered at 6:00 p.m.. Please confirm that your client will be present at that time to surrender the children.

Should he not be present, we will be seeking Court intervention. Please call or email if you wish to discuss further.

Thank you,

Lexa Willen

Alexandra "Lexa" Willen

Associate Attorney

awillen@shemeshfamilylaw.com

Law Offices of Amber Shemesh, P.C.

12222 Merit Dr., Suite 1202

Dallas, TX 75251

214-432-2501 main

214-432-2510 facsimile

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Celia Morgan

From: No-Reply@eFileTexas.gov
Sent: Tuesday, July 28, 2020 8:33 AM
To: Celia Morgan
Subject: Filing Returned for Envelope Number: 44866590 in Case: 417-53803-2020, In the Interest of S.L., J.L. and L.L. Children for filing Motion to Modify

Filing Returned

Envelope Number: 44866590
Case Number: 417-53803-2020
Case Style: In the Interest of S.L., J.L. and L.L. Children

The filing has been reviewed and returned for correction. **Please refile with the corrections indicated below.** For instructions on how to retain your original file stamp date, consult with your electronic filing service provider or the clerk's office. An electronically filed document is deemed filed when delivered to the electronic filing service provider, unless it is filed on a Saturday, Sunday, or legal holiday (in which case it is deemed filed on the next day that is not a Saturday, Sunday, or legal holiday)—or the document requires a motion and an order permitting the document to be filed.

Return Reason(s) from Clerk's Office	
Court	Collin County - District Clerk
Returned Reason	Insufficient Fees - TRCP 99(d) and §51.318(b)(7) and (8)
Returned Comments	Application for TRO in existing case is $65.00. Please add the correct fees and fees for issuance again. Filler has five business days to resubmit. Thank you, Tatiana - tortega@co.collin.tx.us – 972-548-4235

Document Details	
Case Number	417-53803-2020
Case Style	In the Interest of S.L., J.L. and L.L. Children
Date/Time Submitted	7/27/2020 5:12 PM CST
Filing Type	Motion to Modify
Filing Description	Petition to Modify Parent Child Relationship
Activity Requested	EFileAndServe
Filed By	Celia Morgan
Filing Attorney	Elizabeth Nielsen

EXHIBIT
tabbies 7

Celia Morgan

From: No-Reply@eFileTexas.gov
Sent: Tuesday, July 28, 2020 8:33 AM
To: Celia Morgan
Subject: Filing Returned for Envelope Number: 44866590 in Case: 417-53803-2020, In the Interest of S.L., J.L. and L.L. Children for filing Proposed Order

Filing Returned

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Court	Collin County - District Clerk
Returned Reason	Insufficient Fees - TRCP 99(d) and §51.318(b)(7) and (8)
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Document Details	
Case Number	417-53803-2020
Case Style	In the Interest of S.L., J.L. and L.L. Children
Date/Time Submitted	7/27/2020 5:12 PM CST
Filing Type	Proposed Order
Filing Description	Temporary Restraining Order and Order Setting Hearing
Activity Requested	EFileAndServe
Filed By	Celia Morgan
Filing Attorney	Elizabeth Nielsen

EXHIBIT
8

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Lucia Rodriguez on behalf of Elizabeth Nielsen
Bar No. 24034601
lrodriguez@galyen.com
Envelope ID: 45309962
Status as of 08/12/2020 12:01:07 PM -05:00

Associated Case Party: Kelly Long

Name	BarNumber	Email	TimestampSubmitted	Status
Amber Shemesh		amber@shemeshfamilylaw.com	8/12/2020 10:53:35 AM	SENT
Adriana Cancino		acancino@shemeshfamilylaw.com	8/12/2020 10:53:35 AM	SENT
Alexandra Willen		awillen@shemeshfamilylaw.com	8/12/2020 10:53:35 AM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Elizabeth A.Nielsen		enielsen@galyen.com	8/12/2020 10:53:35 AM	SENT
Celia Morgan		cmorgan@galyen.com	8/12/2020 10:53:35 AM	SENT